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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SHUBO ZHANG,
Plaintiff,

C 3:23-cv-04494 LJC

ALEJANDRO MAYORKAS, Secretary,
Department of Homeland Security, *et al.*,

STIPULATION TO EXTEND TIME WITHIN WHICH DEFENDANTS MUST FILE A RESPONSE AND ORDER

Defendants.

The parties, through their undersigned attorneys, hereby stipulate to an extension of time within which the Defendants must serve the answer or otherwise respond in the above-entitled action. Defendants will file their response on or before January 16, 2024.

The parties further request a corresponding extension on the deadline for filing a summary judgment motion under the Court's Immigration Mandamus Procedural Order. Currently, if Plaintiff has not filed a motion for summary judgment by 90 days after the Complaint was filed, or November 28, 2023, Defendants must file a motion for summary judgment by 120 days after the Complaint was served, or January 16, 2024. In light of the agreed-upon extension for Defendants' response to the Complaint, the parties request that, if Plaintiff has not filed a motion for summary

Stip to Extend
C 3:23-cv-04494 LJC

1 judgment by January 29, 2024, Defendants must file their motion for summary judgment by
2 March 18, 2024. In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all
3 signatories listed herein concur in the filing of this document.

4 Dated: November 17, 2023

Respectfully submitted,

5 ISMAIL J. RAMSEY
United States Attorney

7 */s/ Elizabeth D. Kurlan*
ELIZABETH D. KURLAN
8 Assistant United States Attorney
Attorneys for Defendants

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10 Dated: November 17, 2023

11 */s/ Eric Martin*
ERIC MARTIN
12 Attorney for Plaintiff

13
14 **ORDER**

15 Pursuant to stipulation, IT IS SO ORDERED.

16 Date: November 20, 2023

17 
18 LISA J. CISNEROS
United States Magistrate Judge

DECLARATION OF ELIZABETH D. KURLAN

I, Elizabeth D. Kurlan, declare and state as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Northern District of California and counsel of record for the federal Defendants in the above-captioned action.

2. On August 30, 2023, Plaintiff filed a complaint in which she brings a mandamus action seeking adjudication of her Form I-130, Petition for Alien Relative. *See* Dkt. No. 1. Our office was served with the complaint on September 18, 2023.

3. On November 2, 2023, I contacted Plaintiff regarding Defendants' request for an additional extension of time to prepare their response to the complaint, and Plaintiff consented to the request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: November 16, 2023

/s/ Elizabeth D. Kurlan
ELIZABETH D. KURLAN
Assistant United States Attorney